

Consideration of Comments

Project 2008-12 Coordinate Interchange Standards

The Project 2008-12 Drafting Team thanks all commenters who submitted comments on the draft INT-004-3 and INT-010-2 standards. These standards were posted for a 45-day public comment period from December 12, 2013 through January 22, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 24 sets of comments, including comments from approximately 91 different people from approximately 57 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Summary Consideration

The CISDT considered each comment submitted by stakeholders. The summary of the consideration of those comments follows.

INT-004-3

Many stakeholders agreed with the revisions to INT-004-3. Several stakeholders suggested clarifying edits with which the drafting team agreed. The drafting team made the following revisions to INT-004:

- Capitalized “Dynamic Transfer” throughout for consistency.
- Added a footnote to “on-time” in Requirement R1 to point to the timing tables in INT-006-4.
- Replaced “For” with “for” in Requirement R2 (Request for Interchange).
- Removed the “,” at the end of the Severe VSL for R1 and replaced it with a “.”
- Capitalized Frequency Bias, Frequency Bias Setting in the table in the Guidelines and Technical Basis section.
- Reworded two sentences in the Guidelines and Technical Basis section for clarity.

A couple of commenters suggested improvements to the Severe VSL for Requirement R3. The existing VSL reads: “The Balancing Authority did not implement or operate a Pseudo-Tie that was included in the NAESB

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

Electric Industry Registry publication.” The language of the requirement is for the Balancing Authority to only implement or operate a Pseudo-Tie that is registered. The CISDT has revised the VSL as suggested to: “The Balancing Authority implemented or operated a Pseudo-Tie that was not included in the NAESB Electric Industry Registry publication.”

A couple of commenters suggested the addition of the LSE as an applicable entity in addition to the PSE. The CISDT notes that having multiple entities responsible for the same requirement will lead to confusion which could potentially create a reliability gap if each entity assumed that the other entity was handling the responsibility. If the PSE is the entity responsible that any PSE that is taking this action, even if not registered as an LSE, is still the responsible entity.

A few commenters had questions or concerns around the registration of Pseudo-Ties. Creating a formal registration process creates a clear mechanism by which all entities are informed and can account for Pseudo-Ties in congestion management procedures. Inclusion of Pseudo-Ties in congestion management procedures will need to be determined on a case by case basis, as each Pseudo-Tie configuration is unique. If all entities do not agree on the ‘setup’ during registration, then the Pseudo-Ties would not become implemented. While NAESB business practices are commercial in nature, the information in the EIR is a common tool used by both business practice and reliability tools. As such, the committee that supports this tool is a joint NERC and NAESB subcommittee. The registration process has yet to be detailed and it is possible that process to identify how the Pseudo-Tie is handled in congestion management procedures. The CISDT encourages all entities to participate in the development of the Pseudo-Tie registration in NAESB.

Request for Interchange (RFI)

The majority of commenters agreed with the proposed revisions to the definition of Request for Interchange (RFI). No changes were made to the definition as a result of comments received.

One commenter suggested that the proposed defined term Arranged Interchange is not needed as it is effectively the same as (and redundant to) Request for Interchange. The CISDT disagrees that the two terms are redundant. An RFI is a collection of data whereas Arranged Interchange is a state where the RFI has been submitted. These definitions align with NAESB Business Practices definitions and the NERC Interchange Reference Guidelines, version 2.

Another commenter noted that the definition of Request for Interchange references the NAESB Business Practice Standards and they are not publicly available. The CISDT notes that NAESB business practices are available to the public for a fee. FERC has ruled in the past that this is a reasonable practice.

One stakeholder disagreed with the inclusion of intra-BA schedules in the definition because there is a direct conflict with other NERC glossary terms. The CISDT does not believe that there is a conflict with other terms and notes that this was added to the definition to address a FERC Order 693 directive.

Arranged Interchange

The majority of commenters agreed with the proposed revisions to the definition of Arranged Interchange. No changes were made as a result of comments received.

One commenter was unclear how the proposed change in the definition of Arranged Interchange would impact other standards, particularly MOD-004-1, R11 and R12. The revisions to this defined term do not change the intent of the requirements or defined terms in which it is used. The revisions provide additional clarity for these requirements and defined terms.

One commenter disagreed with the inclusion of the clause “initial or revised”. The CISDT notes that this is included in the existing, approved definition because Arranged Interchange may be revised and the team believes that this clarification is an improvement to the definition.

INT-010-2

Most stakeholders agreed with the revisions to INT-010-2. Several stakeholders suggested clarifying edits with which the drafting team agreed. The drafting team made the following revisions to INT-010:

- Added the Guidelines and Technical Basis Section to the clean version of the standard (it was in the redline version but inadvertently omitted here).
- Revised “RFI” to “Request for Interchange” for consistency throughout.
- Added “when the use of the energy sharing agreement exceeded 60 minutes.” To the VSLs for R1 to clarify that an RFI does not need to be submitted unless this condition is met. This matches the language of the requirement.
- Capitalized “Dynamic Transfer” throughout for consistency.
- Reworded two sentences in the Guidelines and Technical Basis section for clarity.
- Removed Transmission Service Provider from section 1.2, Evidence Retention.
- Added “(CEA)” after “Compliance Enforcement Authority” in section 1.2, Evidence Retention.
- Capitalized “Schedule” in the term “Interchange Schedule”.

Two stakeholders questioned the use of the phrase “or other reliability needs” within Requirement R1. As this requirement relates to energy sharing agreements, the CISDT believes that the content of those agreements will address the “other reliability needs” and that the drafting team is unable to develop a comprehensive list of what those agreements might contain.

Another stakeholder expressed concern that the Rationale would be lost once the standard is approved. The CISDT notes that the Rationale for each requirement will be contained in the Guidelines and Technical Basis section of the standard for future reference.

One stakeholder believes that there is a conflict with the NERC defined terms “Request for Interchange” and “Interchange” as used in Requirement R3 because RFI includes intra-BA transfers. The CISDT notes R3 is

consistent with BA to BA transfers that are the intent of the requirement. Intra-BA transfers are not addressed in this requirement as they are not included in the ACE equation.

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
2.	David Burke	Orange and Rockland Utilities Inc.	NPCC	3
3.	Greg Campoli	New York Independent System Operator	NPCC	2
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
5.	Chris de Graffenried	Consolidated Edison Co, of New York, Inc.	NPCC	1
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5
8.	Kathleen Goodman	ISO - New England	NPCC	2
9.	Michael Jones	National Grid	NPCC	1

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																																															
			1	2	3	4	5	6	7	8	9	10																																						
10. Mark Kenny	Northeast Utilities	NPCC	1																																															
11. Christina Koncz	PSEG Power LLC	NPCC	5																																															
12. Helen Lainis	Independent Electricity System Operator	NPCC	2																																															
13. Michael Lombardi	Northeast Power Coordinating Council	NPCC	10																																															
14. Randy MacDonald	New Brunswick Power Transmission	NPCC	9																																															
15. Bruce Metruck	New York Power Authority	NPCC	6																																															
16. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																																															
17. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																																															
18. Robert Pellegrini	The United Illuminating Company	NPCC	1																																															
19. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																																															
20. David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																																															
21. Brian Robinson	Utility Services	NPCC	8																																															
22. Ayesha Sabouba	Hydro One Networks Inc,	NPCC	1																																															
23. Brian Shanahan	National Grid	NPCC	1																																															
24. Wayne Sipperly	New York Power Authority	NPCC	5																																															
25. Ben Wu	Orange and Rockland Utilities Inc.	NPCC	1																																															
26. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																																															
2.	Group	Randi Heise	Dominion NERC Compliance Policy			X		X		X	X																																							
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5. Randi Heise	Dominion	MRO	6																																															
3.	Group	Pamela Hunter	Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing			X		X		X	X																																							
No Additional Responses																																																		

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4.	Group	Brent Ingebrigtsen	PPL NERC Registered Affiliates	X		X		X	X				
Additional Member		Additional Organization		Region	Segment Selection								
1.	Charlie Freibert	Louisville Gas and Electric Company and Kentucky Utilities Company		SERC	3								
2.	Brenda Truhe	PPL Electric Utilities Corporation		RFC	1								
3.	Annette Bannon	PPL Generation, LLC		RFC	5								
4.		PPL Montana, LLC		WECC	5								
5.		PPL Susquehanna, LLC		RFC	5								
6.	Elizabeth Davis	PPL EnergyPlus, LLC		MRO	6								
7.				NPCC	6								
8.				RFC	6								
9.				SERC	6								
10.				SPP	6								
11.				WECC	6								
5.	Group	Donald Hargrove	Oklahoma Gas and Electric Co	X		X		X	X				
Additional Member		Additional Organization		Region	Segment Selection								
1.	Teri Pyle	OKGE		SPP	1								
2.	Leo Staples	OKGE		SPP	5								
3.	Jerry Nottmangel	OKGE		SPP	6								
6.	Group	Michael Lowman	Duke Energy	X		X		X	X				
Additional Member		Additional Organization		Region	Segment Selection								
1.	Doug Hils			RFC	1								
2.	Lee Schuster			FRCC	3								
3.	Dale Goodwine			SERC	5								
4.	Gerg Cecil			RFC	6								
7.	Group	Janet Smith, Regulatory Affairs Supervisor	Arizona Public Service Company	X		X		X	X				
No Additional Responses													
8.	Group	Frank Gaffney	Florida Municipal Power Agency	X		X	X	X	X				

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9.	Group	Rene Free	SERC OC Review Group	X		X		X	X																																											
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10.	Group	Greg Campoli	ISO/RTO Council Standards Review Committee		X																																															
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6. Charles Yeung	SPP	SPP																																																		
11.	Group	Jason Marshall	ACES Standards Collaborators						X																																											
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2.	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1									
3.	Scott Brame	North Carolina Electric Membership Corporation	SERC	1, 3, 4, 5									
4.	Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3, 4									
5.	Ellen Watkins	Sunflower Electric Power Corporation	SPP	1									
6.	Bernard Johnson	Oglethorpe Power Corporation	SERC										
12.	Group	Jamison Dye	Bonneville Power Administration	X		X		X	X				
Additional Member		Additional Organization		Region Segment Selection									
1.	Mary Willey	Trans Commercial System Mgmt	WECC	1									
13.	Group	Robert Rhodes	SPP Standards Review Group		X								
Additional Member		Additional Organization		Region Segment Selection									
1.	Allan George	Sunflower Electric Power Corporation	SPP	1									
2.	Stephanie Johnson	Westar Energy	SPP	1, 3, 5, 6									
3.	Allen Klassen	Westar Energy	SPP	1, 3, 5, 6									
4.	Tiffany Lake	Westar Energy	SPP	1, 3, 5, 6									
5.	Shannon Mickens	Southwest Power Pool	SPP	2									
6.	James Nail	City of Independence, MO	SPP	3									
7.	Buck Reuter	Westar Energy	SPP	1, 3, 5, 6									
14.	Individual	Russell Noble	Cowlitz PUD			X	X	X					
15.	Individual	Michael Falvo	Independent Electricity System Operator		X								
16.	Individual	Shirley Mayadewi	Manitoba Hydro	X				X	X				
17.	Individual	Paul Kerr	Shell Energy North America						X				
18.	Individual	Anthony Jablonski	ReliabilityFirst										X
19.	Individual	Thomas Foltz	American Electric Power	X		X		X	X				
20.	Individual	Alice Ireland	Xcel Energy	X		X		X	X				
21.	Individual	Chris Scanlon	Exelon	X		X	X	X	X				
22.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
23.	Individual	Russell Noble	Cowlitz PUD			X	X	X					
24.	Individual	Tom Bowe	PJM		X								

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Organization	Agree	Supporting Comments of "Entity Name"
South Carolina Electric and Gas	Agree	SERC OC

1. The drafting team has revised INT-004-3 in response to stakeholder comments. Do you support the proposed changes?

Summary Consideration: Most stakeholders agreed with the revisions to INT-004-3. Several stakeholders suggested clarifying edits with which the drafting team agreed. The following revisions were made:

- Capitalized “Dynamic Transfer” throughout for consistency.
- Added a footnote to “on-time” in Requirement R1 to point to the timing tables in INT-006-4.
- Replaced “For” with “for” in Requirement R2 (Request for Interchange).
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- Reworded two sentences in the Guidelines and Technical Basis section for clarity.

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A few commenters had questions or concerns around the registration of Pseudo-Ties. Creating a formal registration process creates a clear mechanism by which all entities are informed and can account for Pseudo-Ties in congestion management procedures. Inclusion in congestion management procedures will need to be determined on a case by case basis as each Pseudo-Tie configuration is unique. While NAESB business practices are commercial in nature, the information in the EIR is a common tool used by both business practice and reliability tools. As such, the committee that supports this tool is a joint NERC and NAESB subcommittee. The registration process has yet to be detailed and it is possible that process to identify how the Pseudo-Tie is handled in congestion management procedures. If all entities do not agree on the ‘setup’ during registration, then the Pseudo-Ties would not become implemented. The CISDT encourages all entities to participate in the development of the Pseudo-Tie registration development in NAESB.

Organization	Yes or No	Question 1 Comment
PPL NERC Registered Affiliates	No	<p>These comments are submitted on behalf of the following PPL NERC Registered Affiliates: Louisville Gas and Electric Company and Kentucky Utilities Company; PPL EnergyPlus, LLC; PPL Electric Utilities Corporation; PPL Generation, LLC, PPL Susquehanna, LLC and PPL Montana, LLC on behalf of its NERC registered entities. The PPL NERC Registered Affiliates are registered in six regions (MRO, NPCC, RFC, SERC, SPP, and WECC) for one or more of the following NERC functions: BA, DP, GO, GOP, IA, LSE, PA, PSE, RP, TO, TOP, TP, and TSP. It is unclear in R1 as to which BA’s congestion management procedures the information for the Psuedo-Tie is to be included, the Source BA’s or the Sink BA’s (or both).</p>
Oklahoma Gas and Electric Co	No	<p>INT-004-3 R3 requires BA’s to only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry. This is clearly a Commercial/Business practice issue. From a reliability perspective if the RC, PC and TSP are informed, a BA should be able to implement or operate a Pseudo-Tie. Requiring administrative reporting to a non-reliability (commercial / business practice) entity is not appropriate for the Reliability Standards. This requirement falls clearly with Criteria A and Criteria B6 of the paragraph 81 criteria and should be removed from the draft Standard. Criterion A (Overarching Criterion) The Reliability Standard requirement requires responsible entities (“entities”) to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES. Criterion B (Identifying Criteria)B6. Commercial or Business Practice The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues. This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.</p>

Organization	Yes or No	Question 1 Comment
Duke Energy	No	Duke Energy suggests the following change to R3 of INT-004-3, "Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication. "Since NAESB will define the requirements for Pseudo-Tie registration, there is no need to add "in support of congestion management procedures." Based on the Purpose of the standard, as written, our interpretation is that this is already understood.
ACES Standards Collaborators	No	(1) We do not support this concept as a reliability standard and believe it should be retired and transferred to NAESB. The purpose statement of the standard is to ensure that Dynamic Schedules and Pseudo Ties are "accounted for appropriately in congestion management procedures." While this is an important business practice to ensure the schedules are treated equitably, it is not a reliability issue and should not be in a NERC standard. Congestion management procedures are designed and intended to ensure the transmission service is curtailed based on its priority so that lower priority service does not supersede higher priority service. It designed to comport with FERC pro forma tariff requirements for the treatment of various levels of transmission service. A reliability entity such as a BA, TOP, or RC must still be able to reduce loading via other methods (e.g. manual redispatch or transmission reconfiguration) in addition to congestion management. While some entities (e.g. ISO and RTOs) have designed very effective congestion management procedures that are defined by their tariffs through the use of locational marginal pricing (LMP), they are still required to have other capabilities to reduce loading (e.g. manual redispatch or transmission configuration). Thus, congestion management is clearly a business practice designed to facilitate the orderly curtailment of transmission service so that lower priority service is curtailed first. Congestion management is a tool to facilitate management of transmission service curtailments. It is not a reliability tool. Thus, a NERC

Organization	Yes or No	Question 1 Comment
		standard designed to ensure that Dynamic Schedules and Pseudo-Ties are tagged is an important business practice but is not required for reliability. This standard should be retired and moved to NAESB.
Cowlitz PUD	No	Cowlitz disagrees with the SDT dismissal of comments submitted by Seattle City Light.
Manitoba Hydro	No	(1) R1 - We note the addition of language by the SDT in the Rationale for R1 with respect to a situation where no forecast may be available. It is Manitoba Hydro's view that the text currently contained in the Rationale with respect to what is required to be in an RFI belongs more appropriately in the body of the standard itself rather than in a Rationale. Our understanding is that the content of the Rationale text boxes will be moved to the Application Guidelines section of the standard upon approval of the standard; the content of the Application Guidelines section is not one of the mandatory or enforceable components of a reliability standard even though they may be looked to for guidance by entities and auditors. This particular Rationale goes beyond an explanation by the SDT of why the requirement/part is required, or why the wording changes are appropriate, and provide specific direction as to the appropriate inclusion in the RFI; something that is missing in the body of the standard itself. (Law, Export Operations, RCD)(2) R1 - The additional language added by the SDT, while it does attempt to address circumstances where no forecast is available, still leaves some uncertainty as to the appropriate volume to be tagged in an RFI. Suggested alternative language to make it abundantly clear would be: "If no forecast is available for the Dynamic Schedule, the energy profile in the Request for Interchange should be the expected maximum value of the Dynamic Schedule."
Shell Energy North America	No	Shell Energy North America disagrees with the comments filed and the decision to revert the applicability of INT-004 to Purchasing Selling Entities.

Organization	Yes or No	Question 1 Comment
		<p>The wording in the proposal at R1 retains the condition existing in the currently approved INT-001 standard that the subject transactions are taking place to serve load. R2 is entirely contingent on R1 and continues the misplaced applicability to PSEs. This load serving aspect remains the impetus to the belief by some stakeholders that this type of activity has reliability impacts, rather than being the business process requirements that they truly are. If the R1 and R2 requirements of the standard are to be maintained, the applicability should be on Load Serving Entities as originally proposed in the this Project. LSEs engaging in such transactions are the responsible party, and if the LSE is not also a PSE, a reliability gap will be created by setting the applicability to PSEs.</p>
ReliabilityFirst	No	<p>During the last comment period, ReliabilityFirst questioned the term “on-time” within Requirement R1. ReliabilityFirst appreciates the SDT response that “The term ‘on-time’ is addressed in the timing tables contained in INT-006”. ReliabilityFirst believes a reference to the INT-006 standard should be placed in the INT-004-3 standard. Absent a reference to the INT-006 standard, those not familiar with the table in the INT-006 standard may not understand the meaning of the term “on-time” and thus cause both reliability and compliance complications.</p>
Xcel Energy	No	<p>Xcel Energy is voting negative b/c we do not agree with the inclusion of Pseudo-Ties. Here are our specific issues with each requirement:R1- Pseudo-Ties do not have tags, they are metered into the BA as part of the NAI term of the ACE equation.R2- All references to Pseudo-Ties should be removed. This requirement is just for “Confirmed Interchange” that is a Dynamic Schedule, which is part of the NSI term of the ACE equation.R3- This requirement should specify a minimum level before registration of a Pseudo-Tie is required. We feel Pseudo-Ties should only be registered if they are in a congested transmission area.</p>

Organization	Yes or No	Question 1 Comment
Cowlitz PUD	No	The Standard mixes applicability in the Requirement. Please state applicability in Section 4.
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	INT-004-3 R1: How do entities know the forecast for submitted pseudo-ties included in congestion management? In order to add bounds to the alternate method, we request that the SDT consider adding the following (bolded section) to R1:Each Purchasing-Selling Entity that secures energy to serve Load via a Dynamic Schedule or Pseudo-Tie shall ensure that a Request for Interchange is submitted as an on-time Arranged Interchange to the Sink Balancing Authority for that Dynamic Schedule or Pseudo-Tie, unless the information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method that provides a projection of usage of the Pseudo-Tie to the Transmission Operator.INT-004-3 R3: We request that the SDT consider adding the following (bolded section) to R3 in order to clarify roles and responsibilities:Each Purchase-Selling Entity is responsible for registering Pseudo-Ties in the NAESB Electronic Industry Registry publication. Each Balancing Authority shall only implement or operate a Pseudo-Tie that is included in the NAESB Electric Industry Registry publication in order to support congestion management procedures.
SERC OC Review Group	Yes	We respectfully submit a change to R3 Sever VSL to further align with R3.Current Language: The Balancing Authority did not implement or operate a Pseudo-Tie that was included in the NAESB Electric Industry Registry publication.Proposed Language: The Balancing Authority DELETE: “did not” implement Add: “ed” or operate Add: “d”a Pseudo-Tie that was Add: “Not” included in the NAESB Electric Industry Registry publication.
Bonneville Power Administration	Yes	BPA supports the proposed changes to the draft INT-004-3 except for the Rational in R1. The Rationale starting with the second sentence is not valid

Organization	Yes or No	Question 1 Comment
		<p>for R1. R1 is regarding when a PSE must submit an RFI for Dynamic Transfer. How information is utilized does not belong in a rationale for such a requirement. The second and third sentence in Rational R1 should be removed. The second sentence is unclear as to what is meant by “max transaction profile”. E-tags do not have a “transaction profile”. The third sentence in the rationale implies that if a forecast is used, the transmission profile can be exceeded. In the Table of Compliance Elements, the last sentence of the Severe VSL description for R1 ends with a comma. Assuming more verbiage does not follow the comma but is not visible in the table, the comma should be replaced with a period. Dynamic Transfer is a defined NERC Glossary term and as such, BPA suggests that the draft team capitalize the term if its use is intended to align with the NERC definition.</p>
SPP Standards Review Group	Yes	<p>While we have no issues with the proposed changes to the most recent draft that has been posted, in this reading we did note a few items that we missed in previous readings of the standard. Most of these items are minor with the exception of an item regarding the Severe VSL for R3. This is a significant item and needs to be corrected in the proposed draft in order for us to continue to support the proposed standard. We recommend modifying the Severe VSL for R3 to read: ‘The Balancing Authority implemented or operated a Pseudo-Tie that was not included in the NAESB Electric Industry Registry publication.’ This wording is more on-point since the requirement does not require Balancing Authorities to implement or operate all Pseudo-Ties in the NAESB Registry but restricts the Balancing Authority to only implement or operate those Pseudo-Ties which are included in the Registry. Capitalize Dynamic Transfer throughout the Background and the Application Guidelines sections since the term is in the Glossary of Terms. Use a lower case ‘for’ in ‘Request for Interchange’ in R2.Capitalize Frequency Bias Setting, Frequency Bias and Dynamic Schedule in the table in the Application Guidelines on Page 9.We suggest modifying the first sentence under the General Considerations for Curtailments of</p>

Organization	Yes or No	Question 1 Comment
		<p>Dynamic Transfers section in the Application Guidelines to read: ‘The unique handling of Curtailments of Dynamic Transfers is described in NERC’s Dynamic Transfer Reference Guidelines, Version 2.’Capitalize ‘Curtailment’ in the paragraph under For Dynamic Schedules in the Application Guidelines.We suggest modifying the last paragraph on Page 9 of the Application Guidelines to read: ‘Both sections above describe when Curtailments (typically communicated through e-Tags) of Dynamic Transfers require additional action by Balancing Authorities to ensure compliance with the Curtailment.’Use a lower case ‘signal’ in Dynamic Transfer signal in the last paragraph of the Application Guidelines on Page 10.</p>
American Electric Power	Yes	<p>Though we welcome the addition of the PSE in the applicability section, we believe the LSE should be retained rather than replacing it entirely. In some non-RTO areas for example, there is the potential that it is the LSE who would be tasked with performing this work.Our negative vote on this standard is solely driven by the removal of the LSE in the Applicability section. We believe that the BA, PSE, *and* LSE should all be included.</p>
Exelon	Yes	<p>We support the combination of INT-001 and INT-003 however, the registration of a Pseudo - Tie in NAESB must be transparent to all parties. Currently, that information is not readily available.</p>
Florida Municipal Power Agency		<p>Our comments from last November’s posting were not addressed. In summary, FMPA believes these standards are not important for reliability, are commercial in nature, and are duplicative of NAESB standards and BAL standards. Please refer to our comments submitted on November 13, 2013.</p>
PJM	No	<p>PJM does not support R1, as written. A requirement to tag Pseudo-Ties ensures that all involved parties, including wide-area congestion management tools, have visibility into the path and estimated magnitude of the transfer; however, the alternative to include the Pseudo Tie in</p>

Organization	Yes or No	Question 1 Comment
		<p>“congestion management procedures via an alternate method” fails to provide that same visibility. The existing language implies that a local congestion management procedure established in the Native BA's footprint is sufficient to meet the requirement for not tagging a Pseudo Tie that may span several Intermediate BAs. If the requirement is meant to ensure that all involved BAs and all congestion management procedures/tools benefit from added visibility, the existing language is insufficient.</p> <p>PJM also asks the drafting team to consider extending R3 to require that a Balancing Authority only implement and operate Dynamic Schedules that have been registered in the NAESB Electric Industry Registry. If the drafting team sees value in requiring the registration of Pseudo Ties, whether or not they are tagged, PJM believes similar value could be gained by extending the requirement to Dynamic Schedules.</p>
Northeast Power Coordinating Council	Yes	
Dominion NERC Compliance Policy	Yes	
Arizona Public Service Company	Yes	
ISO/RTO Council Standards Review Committee	Yes	
Independent Electricity System Operator	Yes	

2. The drafting team has the definition of Request for Interchange (RFI) in response to stakeholder comments. Do you support the proposed changes?

Summary Consideration: The majority of commenters agreed with the proposed revisions to the definition of Request for Interchange (RFI).

One commenter suggested that the proposed defined term Arranged Interchange is not needed as it is effectively the same as (and redundant to) Request for Interchange. The CISDT disagrees that the two terms are redundant. An RFI is a collection of data whereas Arranged Interchange is a state where the RFI has been submitted. These definitions align with NAESB Business practices definitions and the NERC Interchange Reference Guidelines, version 2.

Another commenter noted that the definition of Request for Interchange references the NAESB Business Practice Standards and they are not publicly available. The CISDT notes that NAESB business practices are available to the public and there is a cost associated with these. FERC has ruled in the past that this is a reasonable practice.

One stakeholder disagreed with the inclusion of intra-BA schedules in the definition because there is a direct conflict with other NERC glossary terms. The CISDT does not believe that there is a conflict with other terms and notes that this was added to the definition to address a FERC Order 693 directive.

Organization	Yes or No	Question 2 Comment
PPL NERC Registered Affiliates	No	The proposed defined term Arranged Interchange is not needed as it is effectively the same as (and redundant to) Request for Interchange. Each is a set of data that has been submitted for approval. The verb “submitted” implies “submitted for approval” in the definition of Request for Interchange. To clarify this issue, the SDT should revise the definition of Request for Interchange to the following: A collection of data as defined in the NAESB Business Practice Standards, that has been initiated or revised and submitted for approval to the Sink Balancing Authority for the purpose of implementing bilateral Interchange between Source and Sink Balancing Authorities or an energy transfer within a single Balancing Authority.

Organization	Yes or No	Question 2 Comment
Oklahoma Gas and Electric Co	No	The definition of “Request for Interchange,” references the NAESB Business Practice Standards. I cannot submit an affirmative vote because I do not have access to the NAESB Business Practice Standards; I have no idea what constitutes the data defined therein. As long as the NAESB standards are not open and freely available like the NERC Standards, I cannot in good conscience vote affirmative on a NERC Reliability Standard or NERC Glossary Definition that references them.
ACES Standards Collaborators	No	(1) We disagree with the inclusion of intra-BA schedules because there is a direct conflict with other NERC glossary terms. “Interchange” is defined in the NERC glossary as “Energy transfers that cross Balancing Authority boundaries.” Thus, “Interchange” only deals with external transfers and does not include intra-BA schedules. We think it will be confusing to define a “Request for Interchange” inconsistently with “Interchange” and that they will be used inconsistently as documented in our response to question 4 regarding INT-010-2 R3. “Request for Interchange” should literally be a request to schedule the NERC term “Interchange,” which would be for energy transfers that cross BA boundaries. The proposed definition of “Request for Interchange” conflicts with the existing definition of “Interchange” and needs to be modified so they are both aligned.
Bonneville Power Administration	Yes	BPA supports the proposed changes to the Request for Interchange definition.
Florida Municipal Power Agency		Please see FMPA comments to Question 1.
Dominion NERC Compliance Policy	Yes	
Southern Company: Southern Company Services, Inc.; Alabama Power Company;	Yes	

Organization	Yes or No	Question 2 Comment
Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing		
Duke Energy	Yes	
Arizona Public Service Company	Yes	
SERC OC Review Group	Yes	
ISO/RTO Council Standards Review Committee	Yes	
SPP Standards Review Group	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
American Electric Power	Yes	
Cowlitz PUD	Yes	
PJM	Yes	

3. The drafting team has revised the definition of Arranged Interchange in response to stakeholder comments. Do you support the proposed changes?

Summary Consideration: The majority of commenters agreed with the proposed revisions to the definition of Arranged Interchange.

One commenter was unclear how the proposed change in the definition of Arranged Interchange would impact other standards, particularly MOD-004-1, R11 and R12. The revisions to this defined term do not change the intent of the requirements or defined terms in which it is used. The revisions provide additional clarity for these requirements and defined terms.

One commenter disagreed with the inclusion of the clause “initial or revised”. The CISDT notes that this is included in the existing, approved definition because Arranged Interchange may be revised and the team believes that this clarification is an improvement to the definition.

Organization	Yes or No	Question 3 Comment
PPL NERC Registered Affiliates		No. See comment to question 2. It is unclear how the proposed change in the definition of Arranged Interchange would impact other standards, particularly MOD-004-1 R11 and R12. Therefore, remove the proposed changes to this definition from the project and use only the one term - Request for Interchange.
Duke Energy		Yes. Duke Energy supports the changes made by the SDT.
Florida Municipal Power Agency		Please see FMPA comments to Question 1.
ACES Standards Collaborators		We disagree with the inclusion of the clause “initial or revised.” Does the definition of “Request for Interchange” include initial requests and revisions to those requests? If so, then the inclusion of the clause “initial or revised” is superfluous. If not, then the definition for Arranged Interchange is implying that “Request for Interchange” can include revisions incorrectly. Either way, the clause should be removed.
Bonneville Power		BPA supports the proposed changes to the Arranged Interchange definition.

Organization	Yes or No	Question 3 Comment
Administration		
Northeast Power Coordinating Council		Yes.
Dominion NERC Compliance Policy		Yes.
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing		Yes.
Oklahoma Gas and Electric Co		Yes.
Arizona Public Service Company		Yes
SERC OC Review Group		Yes
ISO/RTO Council Standards Review Committee		Yes
SPP Standards Review Group		Yes

Organization	Yes or No	Question 3 Comment
Manitoba Hydro		Yes
American Electric Power		Yes.
PJM	Yes	
Cowlitz PUD		Yes

4. The drafting team has revised INT-010-2 in response to stakeholder comments. Do you support the proposed changes?

Summary Consideration: Many stakeholders agreed with the revisions to INT-010-2. Several stakeholders suggested clarifying edits with which the drafting team agreed. The following revisions were made:

- Added the Guidelines and Technical Basis Section to the clean version of the standard (it was in the redline version but inadvertently omitted here).
- Revised “RFI” to “Request for Interchange” for consistency throughout.
- Added “when the use of the energy sharing agreement exceeded 60 minutes.” To the VSLs for R1 to clarify that an RFI does not need to be submitted unless this condition is met. This matches the language of the requirement.
- Capitalized “Dynamic Transfer” throughout for consistency.
- Reworded two sentences in the Guidelines and Technical Basis section for clarity.
- Removed Transmission Service Provider from section 1.2, Evidence Retention.
- Added “(CEA)” after “Compliance Enforcement Authority” in section 1.2, Evidence Retention.
- Capitalized “Schedule” in the term “Interchange Schedule”.

Two stakeholders questioned the use of the phrase “or other reliability needs” within Requirement R1. As this requirement relates to energy sharing agreements, the CISDT believes that the content of those agreements will address the “other reliability needs” and that the drafting team is unable to develop a comprehensive list of what those agreements might contain.

Another stakeholder expressed concern that the Rationale would be lost once the standard is approved. The CISDT notes that the Rationale for each requirement will be contained in the Guidelines and Technical Basis section of the standard for future reference.

One stakeholder believes that there is a conflict with the NERC defined terms “Request for Interchange” and “Interchange” as used in Requirement R3 because RFI includes intra-BA transfers. The CISDT notes R3 is consistent with BA to BA transfers that are the intent of the requirement. Intra-BA transfers are not addressed in this requirement as they are not included in the ACE equation.

Organization	Yes or No	Question 4 Comment
ACES Standards Collaborators		<p>(1) "Request for Interchange" is used inconsistently with "Interchange" in R3. Request for Interchange includes intra-BA transfers. However, by definition, Interchange does not since it only includes "energy transfers that cross Balancing Authority boundaries." Thus, the requirement is written incorrectly when the Request for Interchange is for an intra-BA energy transfers. As an example, R3 requires that a Request for Interchange should be submitted within 60 minutes of the "start of the scheduled Interchange." If the Request for Interchange is for an intra-BA energy transfer, to which Interchange schedule does the requirement refer ? It cannot refer to the Interchange schedule associated with the Request for Interchange, because the definition Interchange does not include intra-BA schedules. The conflict of the NERC defined terms "Request for Interchange" and "Interchange" has created ambiguity and uncertainty in the requirements and needs to be resolved.(2) Thank you for the opportunity to comment.</p>
Cowlitz PUD		Abstain
Manitoba Hydro		<p>Although Manitoba Hydro supports the proposed changes, we have the following comments: (1) R1 - unclear what the phrase 'other reliability needs' is meant to cover. The remainder of the standard only talks about resource loss and doesn't address 'other reliability needs'. (2) M1 - should include greater detail from requirement language. i.e. "The Balancing Authority that uses its energy sharing agreement where the duration of use exceeds 60 minutes from the resource loss shall have...."(3) M3 - RFI is used here, whereas Request for Interchange is used elsewhere. If the RFI acronym is desired, Request for Interchange should be defined as such at its first use and RFI used consistently throughout.(4) VSLs, R1 - RFI is used here, whereas Request for Interchange is used elsewhere. If the RFI acronym is desired, Request for Interchange should be defined as such at its first use and RFI used consistently throughout.(5) VSLs, R2 - RFI is used here, whereas Request for Interchange is used elsewhere. If the RFI acronym is desired, Request for Interchange</p>

Organization	Yes or No	Question 4 Comment
		<p>should be defined as such at its first use and RFI used consistently throughout. Also, the words 'reflecting an Interchange Schedule' should be inserted following 'Request for Interchange'. 'The' scheduled interchange should be 'that' scheduled interchange.</p>
<p>Bonneville Power Administration</p>		<p>BPA supports the proposed changes to the draft INT-010-2 with the following comment: Dynamic Transfer is a defined NERC Glossary term and as such, BPA suggests that the draft team capitalize the term if its use is intended to align with the NERC definition.</p>
<p>Cowlitz PUD</p>		<p>Cowlitz disagrees with the SDT's dismissal of comments submitted by Seattle City Light and NextEra.</p>
<p>ReliabilityFirst</p>		<p>During the last comment period, ReliabilityFirst requested clarification of the term "energy sharing agreement" within Requirement R1. ReliabilityFirst appreciates the SDT response (and updated rationale box within the standard) that stated "There is no NERC Glossary term for this and the CISDT believes that one is not required as these agreements are used for immediate reliability purposes. These could be regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled." ReliabilityFirst does have a concern that once the standard is approved, the rational box will be removed from the standard and the clarification of this term may be lost. ReliabilityFirst recommends including a portion of the rational into the requirement as follows: "The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement [(regional, local, or regulatory reliability agreements which would include the applicable conditions under which the energy could be scheduled)] or other reliability needs covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted..."</p>
<p>Florida Municipal Power</p>		<p>Please see FMPA comments to Question 1.</p>

Organization	Yes or No	Question 4 Comment
Agency		
Independent Electricity System Operator		<p>The revised R1 is unclear on the condition under which a BA needs to submit an RFI no more than 60 minutes beyond the resource loss. The phrase “or other reliability needs” R1 seems to be out of place and subject to a number of possible interpretations. R1 stipulates that:R1. The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no RFI is required. We ask the SDT to revise this to more clearly convey the intent.</p>
SERC OC Review Group		<p>Yes. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.</p>
Duke Energy		<p>Yes. Duke Energy supports the changes made by the SDT.</p>
SPP Standards Review Group		<p>YesWhile we have no issues with the proposed changes to the most recent draft that has been posted, in this reading we did note a few items that we missed in previous readings of the standard. Most of these items are minor with the exception of items in the Severe VSL for R1 and in the Compliance 1.2 Evidence Retention section. These are significant items and need to be corrected in the proposed draft in order for us to maintain our support for the proposed standard.RFIs are only required when an energy sharing agreement is used for more than 60 minutes. The latter portion of the Severe VSL for R1 (after the OR) is currently written such that a Balancing Authority would be non-compliant if it failed to submit a RFI regardless of the length of time the energy sharing agreement was utilized. We recommend inserting ‘...when the use of the energy sharing agreement exceeded 60 minutes...’ at the end of the VSL.Delete</p>

Organization	Yes or No	Question 4 Comment
		<p>'...and Transmission Service provider...' from the Compliance 1.2 Evidence Retention section. The Balancing Authority is the only applicable entity listed in the standard. In that same sentence, insert '(CEA)' following Compliance Enforcement Authority since CEA is used later in this section. Capitalize 'schedule' in Interchange Schedule in R3 and M3. It is a defined term in the Glossary of Terms. The Application Guidelines were not included in the clean version of the standard. Capitalize Dynamic Transfer throughout the Application Guidelines section since it is a defined term in the Glossary of Terms. Modify the first sentence in the Application Guidelines such that it reads the same as we suggested in INT-004-3. 'The unique handling of Curtailments of Dynamic Transfers is described in NERC's Dynamic Transfer Reference Guidelines, Version 2.' Also as in INT-004-3, we suggest modifying the next to last paragraph in the Application Guidelines to read: 'Both sections above describe when Curtailments (typically communicated through e-Tags) of Dynamic Transfers require additional action by Balancing Authorities to ensure compliance with the Curtailment.'</p>
Arizona Public Service Company		Yes
ISO/RTO Council Standards Review Committee		Yes
Northeast Power Coordinating Council		Yes.
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation;		Yes.

Organization	Yes or No	Question 4 Comment
Southern Company Generation and Energy Marketing		
PPL NERC Registered Affiliates		Yes.
PJM	Yes	
Oklahoma Gas and Electric Co		Yes.

END OF REPORT